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**From:** Berner, Ted [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F1949C9653024D3CB4AA4C2BD69C4FDE-BERNER, TED]  
**Sent:** 4/7/2015 3:07:17 PM  
**To:** Ross, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98359cd1f66f46ec91d327e99a3c6909-Ross, Mary]  
**CC:** Cogliano, Vincent [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=51f2736376ac4d32bad2fe7cfef2886b-Cogliano, Vincent]; Vandenberg, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dcae2b98a04540fb8d099f9d4dead690-Vandenberg, John]; Flowers, Lynn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1a4411c874d041b9a8badfc32b91bd70-Flowers, Lynn]; D'Amico, Louis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=78a91f83c4414910be286efe02004dbc-D'Amico, Louis J.]; Birchfield, Norman [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c910f2fd28414e819b6afe6dda525e9f-Birchfield, Norman]  
**Subject:** Re: Differing evaluations of five pesticides by EPA/OPP and IARC

Thanks, Mary, I hear you and don't disagree.

-Ted

**Ted Berner**

**NCEA Assistant Center Director for Risk Analysis**

**U.S. EPA**

**(571) 212-9732**

[berner.ted@epa.gov](mailto:berner.ted@epa.gov)

On Apr 7, 2015, at 10:16 AM, Ross, Mary <[Ross.Mary@epa.gov](mailto:Ross.Mary@epa.gov)> wrote:

So . . . I can't resist speaking up on behalf of EPA. There are certainly things we can do better! However, IARC can convene a panel of scientists, require them to write materials at a meeting, then pull together the document (oversimplifying, I know). They don't have to deal with public comment periods, multiple peer reviews, attention from Congress, working with program offices to communicate and ensure that the products are informative, and so many things that take time but are important to do.

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**From:** Berner, Ted

**Sent:** Tuesday, April 07, 2015 9:50 AM

**To:** Cogliano, Vincent; Vandenberg, John; Ross, Mary; Flowers, Lynn; D'Amico, Louis; Birchfield, Norman

**Subject:** RE: Differing evaluations of five pesticides by EPA/OPP and IARC

Thanks for this, Vince.

I know we have talked about this before, but you just have to love (and marvel!) at IARC's ability to very quickly produce and make public good succinct summaries of the data and conclusions regarding their reviews. Of course, IARC is not subject to the same extensive peer review process that IRIS assessments undergo, but still, you have to be impressed. They reviewed, evaluated, and reached conclusions on the carcinogenicity of five pesticides in about a year! Amazing...

-Ted

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**From:** Cogliano, Vincent

**Sent:** Monday, March 30, 2015 2:01 PM

**To:** Olden, Kenneth; Vandenberg, John; Ross, Mary; Flowers, Lynn; D'Amico, Louis; Birchfield, Norman;

**Subject:** FYI: Differing evaluations of five pesticides by EPA/OPP and IARC

Hello everyone – As I returned yesterday from a long out-of-touch vacation, I saw in the airport version of the NY Times a story about IARC classifying glyphosate (the active ingredient in Roundup) as probably carcinogenic. Kate Guyton, the responsible officer for the IARC meeting earlier this month, was quoted. Diazinon and malathion were also classified as probably carcinogenic, and parathion and tetrachlorvinphos were classified as possibly carcinogenic. This sets up an interesting contrast with EPA/OPP, which has lower classifications for these pesticides. Most notably, glyphosate is classified here as Group E, evidence of non-carcinogenicity.

One reason for the difference is statistical. IARC used trend tests to conclude that two rare tumors were induced in animals, while EPA/OPP used pairwise comparisons to determine that nothing was induced.

Another reason is the consideration of mechanistic data. For the three compounds classified as probably carcinogenic, IARC took into consideration evidence of DNA or chromosomal damage.

Mostly, though, it's a matter that studies in humans are now available. It makes me think that a descriptor like "evidence of non-carcinogenicity" should be used only when some of that evidence is in humans. There are several prominent examples (tobacco, alcohol, arsenic) where positive evidence was observed in humans first.

Overall, it was an interesting exercise in evaluating coherence across human, animal, and mechanistic studies.

Attached are IARC's news release and a summary it published in Lancet Oncology just 10 days after the meeting.

-- Vince